POOR LEGIBILITY

ONE OR MORE PAGES IN THIS DOCUMENT ARE DIFFICULT TO READ DUE TO THE QUALITY OF THE ORIGINAL

SHERWIN-WILLIAMS

LEGAL DEPARTMENT

November 4, 2011

VIA FEDERAL EXPRESS

Craig Whitenack, Civil Investigator
U.S. Environmental Protection Agency Region 9
Southern California Field Office
600 Wilshire Blvd., Suite 1460
Los Angeles, CA 90017

Re: Request for Information - Yosemite Creek Site, San Francisco, CA

Dear Mr. Whitenack:

This letter is in response to the U.S. Environmental Protection Agency's information request for the Yosemite Creek Site. Without waiving any objections, Sherwin-Williams responds as follows:

1. The Sherwin-Williams Company manufactured and sold latex and alkyd based paints, coatings and related products including resins and adhesives. The Company manufactured paint containers.

2a. Sherwin-Williams has not identified any information regarding facilities which shipped drums or other containers to the BAD Site for recycling, cleaning, reuse, disposal, or sale.

2b. Sherwin-Williams had a manufacturing facility in Emeryville, California located at 1450 Sherwin Avenue and at Shellmound Street. Sherwin-Williams also had a container manufacturing facility in San Leandro, California. Sherwin-Williams has not identified any information that either facility shipped drums or other containers to the BAD Site for recycling, cleaning, reuse, disposal, or sale.

2c. Sherwin-Williams has not identified any information regarding any facility located outside of California that shipped any drums or other containers to the BAD Site for recycling, cleaning, reuse, disposal, or sale.

The Sherwin-Williams Company 1100 Midland Building, 101 W. Prospect Avenue, Cleveland, OH 44115-1075

3. The Sherwin-Williams Emeryville, California facility operated from the early 1920s to 2006. The Emeryville facility manufactured latex and alkyd based paints, lacquers, resins and adhesives, and manufactured pesticides until approximately 1947. The San Leandro facility manufactured paint containers and operated until the mid 1980's.

4. See attached Sherwin-Williams' records from the 1970s and 1980s regarding the Emeryville facility. We have identified some of the records as Confidential Business Information.

5. The Emeryville facility sent drums for reconditioning to the Myers Drum Facility on Shellmound Street in Emeryville which was in close proximity to the Sherwin-Williams' facility in Emeryville. Pails were sent to Gonzalez Bucket Company for reconditioning. Drums with waste material were disposed at a Chemical Waste Management facility in California. See responsive documents from Sherwin-Williams records for the facility. The San Leandro facility may have sold small numbers of empty drums to a drum reconditioner, but did not send drums to be reconditioned and returned.

6. See response to question 4. According to the attached documents, Sherwin-Williams has identified the following information:

   Sherwin-Williams purchased Therminol FR as a heat transfer fluid (which may have contained PCBs) in 1971. Sherwin-Williams returned Therminol FR to the supplier in 1972 and replaced it with the purchase of Therminol 66.

   Sherwin-Williams may have used transformer oil since it manifested a small amount of transformer oil to a facility in Arkansas in 1982.

   In 1984, Sherwin-Williams reported purchase of PCBs in a survey, but subsequently corrected the report to state that the facility did not purchase PCBs.

   Also, according to company personnel, small amounts of hydraulic oil were used by the facility to clean forklifts in the 1980s, but are not believed to have contained PCBs.

   No information has been identified regarding PCBs or SOIs at the San Leandro facility.

7. See response to questions 4 and 6. According to the attached documents, transformer oil and heat exchanger fluid contained PCBs.

8. See responses to questions 4 and 6.

9. Sherwin-Williams has not been able to identify the average annual quantity of any substance containing PCB that was purchased or used. According to the attached documents, Sherwin-Williams purchased 7,200 pounds of heat transfer fluid in 1971, and stored PCB containing substances around that time.

10. See response to question 6.

11. See responses to questions 4 and 6.

12. Sherwin-Williams purchased a heat transfer fluid known as Therminol FR and Therminol 66. Sherwin-Williams has not identified the specific type of hydraulic oil, other than that it was used to clean a forklift.

13. See responses to questions 4 and 6 for information on time periods. According to former Emeryville plant personnel, Sherwin-Williams used hydraulic oil in the 1980s.

14. Sherwin-Williams has not identified information on the average annual quantity. See response to questions 4 and 6.

15. See response to questions 4 and 6. In 1972, according to the attached documents, Sherwin-Williams returned heat transfer fluid to Monsanto, which Sherwin-Williams had previously purchased. In 1982, Sherwin-Williams manifested 25 gallons of transformer oil.

16a. See response to question 6 and attached documents. The hydraulic oil was used to clean a forklift.

16b. See documents referring to purchase from and return to Monsanto of Therminol FR that may have contained PCBs. Sherwin-Williams has not identified the name of the contractor that provided the hydraulic oil or the supplier of transformer oil.

16c. Sherwin-Williams has not identified whether the hydraulic oil or any PCB containing substance was brought to the Emeryville facility in bulk or in closed containers.

16d. Small amounts of dirty hydraulic oil were removed and disposed by the contractor after they could no longer be used for cleaning. See responses to questions 4 and 6.

17. See attached documents regarding what appeared to be an agreement to return heat transfer fluid containing PCBs to Monsanto in 1972. Sherwin-Williams has not identified a specific contract regarding the return of this material.

18. Sherwin-Williams has not identified specific personnel who procured Materials at the Emeryville facility. The attached documents refer to personnel who may have been familiar with Therminol FR, Therminol 66 and/or transformer oil. Dilip Tamhane worked at the Emeryville facility from 1983 to 1987 as plant manager and supervised plant operations. Frank McHugh worked at the Emeryville facility, from 1975 to 1988, including as a production manager (and plant manager after the Relevant Time Period).

19. See response to question 4. Sherwin-Williams has not identified how any waste containing SOIs was collected and stored prior to disposal.

20. See response to question 19.

21. Sherwin-Williams notes that the Emeryville manufacturing facility closed in 2006. Henry Ratcliffe (believed to be deceased) was involved in waste disposal for the Emeryville plant in the 1980s.

22. Sherwin-Williams purchased reconditioned drums from the drum reconditioner. See response to question 5.

23. To the best of its knowledge, empty drums containing small amounts of residue, went to a drum reconditioner, and were separate from any waste stream containing hydraulic oil or transformer oil. See attached manifest for transformer oil.

24. Sherwin-Williams has not been involved in any removal or remedial action where there was any claim that PCBs were attributable to Sherwin-Williams. Sherwin-Williams participated in the remediation of the Fields Brook, Ohio Superfund Site, but the PCBs at that site were attributable to two of the other settling parties (not including Sherwin-Williams).

25. Sherwin-Williams has not identified any records of communication between Sherwin-Williams and any of the entities referenced in the question.

26. Sherwin-Williams has not identified any records regarding the hydraulic oil that was used for cleaning at the Emeryville facility.

SHERWIN-WILLIAMS.

27. See attached documents which are referenced in response to various questions above.

Very truly yours,

Allen J. Danzig
Associate General Counsel – Environmental
Phone: (216) 566-2482
Fax: (216) 515-4400
E-mail: allen.j.danzig@sherwin.com

AJD/pal

Enclosure

T.A.M.

12-27-84

December 14, 1984

Mr. John Bauer
Monsanto Company
800 North Lindbergh Blvd.
St. Louis, MO 63167

Dear Mr. Bauer:

As you may be aware, The Sherwin-Williams Company, Oakland Coatings Plant, has purchased in the past your product Therminol FR which was used as a Heat Exchanger Fluid. Approximately late 1971, the Monsanto Chemical Company discontinued manufacture of Therminol FR fluids and, at your request, we returned to you all the Therminol FR we had in the plant. We further replaced the Therminol FR with Therminol 66.

We were recently contacted by EPA Region IX, Toxic Waste Division, who had determined from a review of Monsanto's records the above sale of Therminol FR. The EPA has taken samples of current Heat Exchanger fluid for possible PCB contamination or retention. We thought it best that you were made aware of this.

THE SHERWIN-WILLIAMS COMPANY

D. R. Tauhane
Plant Manager

DRT:jm

cc: J. J. Lenzotti

bcc: Terry Mors,
D. B. Gustafson

T. A. M.

JAN 28 1985

January 22, 1985

MEMO TO FILE

Received a call from Dr. Craddock of Monsanto, 1/22/85.

* Acknowledged my letter of 12/18/84.

* Told me that when the Therminol FR was replaced with Therminol 66 no standards existed for level of PCB (early 1972).

* In May 1979, regulations were published that specified the threshold limit (50 ppm).

* Companies were required to sample by November 1979 and then on an annual basis to reduce the level to below 50 ppm by draining and introducing new oil into the system.

* Advised me that if we had not done the above, we may be liable for any non-compliance to the May 1979 regulations.

* I mentioned to him that we would be in contact with him again should we be found to be out of compliance with EPA.

D. R. Tamhane
Plant Manager - Oakland

cc: JJL TAM DBG

SHERWIN WILLIAMS

INTRA-COMPANY CORRESPONDENCE

RECEIVERS LOCATION AND DEPARTMENT
Cleveland - 6 Stnd.

TO (INDIVIDUALS NAME)
J. J. Lenzotti

REFER TO LETTER OF

cc: DBG

DATE
November 20, 1984

SENDERS LOCATION, DEPARTMENT, AND TELEPHONE NUMBER
Oakland #18 - Plant Manager

SUBJECT
EPA Toxic Waste Management
(Therminol)

You may recall my discussing with you the October 11, 1984 visit to our Oakland facility by EPA Region IX, Toxic Waste Management Division personnel regarding the use of Therminol FR in our Varnish Heat Exchanger. The EPA in a review of Monsanto records, determined we had purchased 7,200 lbs. of Heat Transfer Fluid in 1971, and they were conducting an inspection to check our compliance with the TSCA PCB regulations.

We supplied copies of documents that stated that we had replaced the Therminol FR with Therminol 66 in 1972 and returned the Therminol FR to Monsanto. We, however, do not have any sampling data prior to, or following replacement of the oil.

The EPA asked for a sample of the current Therminol 66 oil on October 25 and we retained a duplicate sample which we had analyzed at a local facility. Their results are attached.

My question is, what is the PEL for Aroclor 1260? What should be our course of action? Should we await results of EPA sample?

Please advise. I discussed this with Terry Mors on November 19, 1984.

D. R. Tamhane

DRT:jm

enc.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

0 7NOV 1984

In Reply Refer to: T-3-2, FIS 1
T(85)E006

Robert J. Storey
Manager of Planning & Materials
The Sherwin-Williams Company
1450 Sherwin Avenue
Emeryville, CA 94608

Dear Mr. Storey:

A PCB investigation was made at The Sherwin-Williams Co. on October 11 & 25, 1984. During the course of this investigation information was gathered by EPA in accordance with Section 11 of the Toxic Substances Control Act. A copy of the investigation report is enclosed for your information.

The deficiencies or violations that may be noted in the report are not necessarily inclusive and any omission of other deficiencies or violations shall not be binding upon the Agency.

Comments may be provided by you concerning any aspect of the report. In your response please refer to report number T(85)E006.

EPA routinely provides copies of investigation reports to State agencies. Such releases will be handled according to the rules governing business confidentiality claims contained in the Code of Federal Regulations (40 CFR, Part 2).

If you have questions concerning this report, please contact Robert E. Peterson, Field Investigator, Field Inspections Section at (415) 974-8365.

Sincerely yours,

Robert E. Peterson for KGS
Kathleen G. Shimmin
Chief, Field Operations Branch
Toxics & Waste Management Division

Enclosure

bc: T-3-2

D. R. TAMHANE

NOV 14 1984

BROWN AND CALDWELL

ANALYTICAL LABORATORIES

November 12, 1984 E84-10-297

Mr. C. Bartsch
Sherwin-Williams Company
1450 Sherwin Avenue
Emeryville, California 94608 P.O.#Y-17492

POLYCHLORINATED BIPHENYL ANALYSIS OF OIL

Date Sampled: 10/25/84
Date Received: 10/29 84
Date Extracted: 11/02/84

Log Number	Sample Description	Results: mg/Kg
10-297-1	#01102584 RP; Heat Transfer Fluid	Aroclor 1260: 56

Aroclors 1016 through 1262 would have been reported had they appeared at or above the detection limit of 0.25 mg/Kg.

Reported by:

James M. Hatfield
Laboratory Director

JMH:csm

J. J. L.

DEC 27 1984

FILE 5524

December 14, 1984

Mr. John Bauer
Monsanto Company
800 North Lindbergh Blvd.
St. Louis, MO 63167

Dear Mr. Bauer:

As you may be aware, the Sherwin-Williams Company, Oakland Coatings Plant, has purchased in the past your product Therminol FR which was used as a Heat Exchanger Fluid. Approximately late 1971, the Monsanto Chemical Company discontinued manufacture of Therminol FR fluids and, at your request, we returned to you all the Therminol FR we had in the plant. We further replaced the Therminol FR with Therminol 66.

We were recently contacted by EPA Region IX, Toxic Waste Division, who had determined from a review of Monsanto's records the above sale of Therminol FR. The EPA has taken samples of current Heat Exchanger fluid for possible PCB contamination or retention. We thought it best that you were made aware of this.

THE SHERWIN-WILLIAMS COMPANY

D. R. Tamhane
Plant Manager

DRT:jm

cc: J. J. Lenzotti

5524

SHERWIN WILLIAMS

INTRA-COMPANY CORRESPONDENCE

RECEIVERS LOCATION AND DEPARTMENT
11 Midland - E, H, & RS

TO (INDIVIDUAL'S NAME)
J.J. Lenzotti

REFER TO LETTER OF

DATE November 21, 1984
TAM-87-84

SENDERS LOCATION, DEPARTMENT, AND TELEPHONE NUMBER
11 Midland - E, H, & RS - 2182

SUBJECT
PCBs in Oakland Heat Exchanger

D. Tamhane called 11/19/84 regarding a heat exchanger that had originally contained PCB fluid. In 1972, after notification from Monsanto, the site replaced the fluid with non-PCB-containing fluid. In 1982, the fluid was either topped-up or replaced.

Earlier this month, Region IX EPA, in reviewing Monsanto sales records, contacted Delip to determine what has been done with the exchanger fluid. EPA visited the site and collected a sample. Delip obtained a split of the sample, and had it analyzed. Lab analysis showed 56 ppm Arochlor 1260.

EPA regulates PCBs in heat exchangers--concentrations exceeding 50 ppm are "outlawed" after July 1, 1984 (published in the July 10, 1984 Federal Register).

If total PCB concentrations include mono-and di-chlorinated biphenyls, EPA discounts the results by a specific factor. I do not know if our lab results take this into account.

I called Delip 11/21/84 to inform him of my findings. EPA is sending the sample out for analysis, but results have not been returned. We can (1) wait for EPA to tell us their results, or (2) contact EPA and let them know our findings.

The regulations require that we drain the transformer and refill it with non-PCB-containing fluid. The spent fluid must be properly disposed in either: (1) incinerator, (2) chemically secure landfill, or (3) high efficiency boiler. EPA will probably levy a fine, but I wouldn't expect it to be too severe.

Delip is sending copies of all the information to you.

T.A. Mors

TAM:lg

I told Delip that it would be a good idea to call EPA and inform them of our findings. I think we have to do it since we have already conducted the analysis.

INVESTIGATION NUMBER T (85) E 0 0 6
DUNS NUMBER 0 0 3 9 3 4 6 0 1

EPA Region 9 TSCA Section 6 PCB Checklist

FACILITY NAME: The Sherwin - Williams Company

STREET ADDRESS: 1450 Sherwin Avenue

Emeryville, CA 94608

MAILING ADDRESS: Same as above

PHONE#: (415) 661-2700

FACILITY TYPE: Production and sales of chemical coatings

REPRESENTATIVE(S): Robert J. Storey - Manager of Planning & Materials
(Name & Title)

Charles H. Bartsch - Plant Engineer

Kendall E. Trautwein - Laboratory Director

INSPECTOR(S): (LEAD) Robert E. Peterson

(2nd) Ayn Schmit

INSPECTION DATE: Oct. 11 & 25, 1984

REPORT DATE: Nov. 7, 1984

PCB USE IN HYDRAULIC AND HEAT TRANSFER SYSTEMS

1. Function of the system in use ?
HEAT TRANSFER SYSTEM FOR USE IN THE PRODUCTION OF VARNISH

2. Manufacturer of the system in use ?
N/A

3(a). Date of the first test of the fluid for PCB's ?
NO RECORDS AVAILABLE OF ANY TESTING DONE, APPARENTLY NONE DONE.

3(b). Was this date prior to November 1, 1979 ?
Yes ☐ No ☐ N/A

3(c). Results of the first test. PCB's N/A PPM

4(a). Date(s) that the system was drained and refilled ?
EARLY 1972 AND April 1982, REFER TO NARRATIVE

4(b). Was this date less than six months after test date ?
Yes ☐ No ☐ NO TESTING DONE

5(a). Date of the second test of the fluid for PCB's
N/A

5(b). Was this date at least three months after the fluid refilling? Yes ☐ No ☐ N/A

6. Has the fluid in the system undergone "treatment" to reduce the level of PCB's ? Yes ☐ No ☒. When and by whom ?

7. Have PCB's been added to this system after July 1, 1984 ?
Yes ☐ No ☒. Why and by whom ?

8. Did the firm dispose of their machinery as muni-waste or salvage ? N/A The system is still in use.

9. Was the liquid tested for PCB content prior to disposal ?
N/A

10. What was the PCB content ? N/A PPM.

11. Was the liquid drained from the machinery prior to disposal ?
N/A

12. Was the machinery flushed with a solvent containing less than 50 PPM PCB prior to disposal ? N/A

BACKGROUND

EPA investigators reviewed a list of purchasers of PCB's sold by The Monsanto Company. This list indicated that The Sherwin Williams Co., Emeryville, CA purchased 7.2 thousand pounds of heat transfer fluid in 1971. An inspection was scheduled to check the compliance of this company with the TSCA PCB regulations.

INSPECTION

EPA investigators Robert Peterson and Ayn Schmit entered The Sherwin Williams Co. on October 11, 1984. The investigators met with Mr. Robert J. Storey - Manager of Planning and Materials, Mr. Kendall D. Trautwein - Laboratory Director, and Mr. Charles H. Bartsch - Plant Engineer.

The company officers were questioned regarding their firm's use of PCB's. Mr. Trautwein stated that "Therminol" used in a heat transfer system may have contained PCB's. Mr. Bartsch stated that he remembered that the company had changed heat transfer fluid types many years ago. He said that he thought that they had followed transfer instructions provided by the fluid's supplier The Monsanto Co. None of the officers could remember if any sampling and analysis for PCB's in any of the fluids had been done.

The officers requested that they be given a few days to search their records to see if any of the requested information was available. Since the information needed was of a historic nature, and no documents were immediately available, the inspectors left the firm. The inspectors told the officers that they would return in a few days.

Inspectors Peterson and Schmit continued the inspection of the the Sherwin Williams Co. on October 25, 1984. Mr. Storey provided documents indicating:

1) Anticipated replacement of Therminol FR with Therminol 66. Memo Jan. 10, 1972 (Document Sample # 02102584RP).

2) Completion of the above replacement "early in the year" (1972) and the shippment of the therminol FR back to the manufacturer. Memo May 17, 1972 (Document Sample # 03102584RP).

3) A second Therminol change completed at the end of April 1982 (Document Sample # 04102584RP).

4) The chemical properties of Therminol 66 from a "Monsanto Material Safety Data Sheet" (Document Sample # 05102584RP).

None of the officers could provide any information or documentation regarding <u>any</u> sampling or analysis of Therminol FR before replacement or of the Therminol 66 after use in the heat transfer system.

With the assistance of company staff a sample of the fluid in the heat transfer system was collected. A duplicate sample was retained by The Sherwin Williams Co. The EPA Sample has been sent to EMSL Las Vegas for analysis.

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

Form Approved
OMB No. 2070-0007
Approval expires 8-31-85

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME
DATE	INSPECTOR NO.	DAILY SEQ. NO.		
10 / 11 / 84	143	N/A	1:35PM	Sherwin - Williams Co.

4. INSPECTOR ADDRESS	5. FIRM ADDRESS
EPA Region 9, 215 Fremont St. San Francisco, CA, 94105	1450 Sherwin Street Emeryville, CA 94608

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

☑ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

☐ In addition, this inspection extends to *(Check appropriate blocks)*:

- ☐ A. Financial data
- ☐ B. Sales data
- ☐ C. Pricing data
- ☐ D. Personnel data
- ☐ E. Research data

The nature and extent of inspection of such data specified in A through E above is as follows:

INSPECTOR SIGNATURE		RECIPIENT SIGNATURE	
Robert E. Peterson		C.H. Bartsch	
NAME		NAME	
Robert E. Peterson		C.H. Bartsch	
TITLE	DATE SIGNED	TITLE	DATE SIGNED
Consumer Safety Officer	10 / 11 / 84	Plant Engineer	10 / 11 / 84

EPA Form 7740-9 (12-82)

INSPECTION FILE

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

TSCA INSPECTION CONFIDENTIALITY NOTICE

Form Approved
OMB No. 2070-0007
Approval expires 8-31-85

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE: 10/11/84	INSPECTOR NO.: 143	DAILY SEQ. NO.: N/A	Sherwin - Williams Co.
3. INSPECTOR NAME: Robert E. Peterson			4. FIRM ADDRESS: 1450 Sherwin Street, Emeryville, CA 94608
5. INSPECTOR ADDRESS: EPA Region 9, 215 Fremont Street, San Francisco, CA, 94105			6. CHIEF EXECUTIVE OFFICER NAME
			7. TITLE

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:	If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.
I have received and read the notice	
SIGNATURE: X [signature]	NAME
NAME: C.H. Bantsch ~~Robert J. Stoller~~ REP	TITLE
TITLE: ~~Manager of Planning~~ 12CP AND ~~Materials~~ REP PLANT ENGINEER; DATE SIGNED: 10/11/84	ADDRESS

EPA Form 7740-4 (12-82)

INSPECTOR'S FILE

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

EPA

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

Form Approved
OMB No. 2070-0007
Approval expires 8-31-85

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME
DATE	INSPECTOR NO.	DAILY SEQ. NO.		
10/25/84	143	N/A	9:00 AM	Sherwin - Williams Co.

4. INSPECTOR ADDRESS	5. FIRM ADDRESS
EPA Region 9, 215 Fremont Street San Francisco, CA 94105	1450 Sherwin Street Emeryville, CA 94608

REASON FOR INSPECTION

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- ☐ D. Personnel data
- ☐ E. Research data

The nature and extent of inspection of such data specified in A through E above is as follows:

INSPECTOR SIGNATURE		RECIPIENT SIGNATURE	
Robert E. Peterson		X [signature]	
NAME		NAME	
Robert E. Peterson		Charles Bartsch	
TITLE	DATE SIGNED	TITLE	DATE SIGNED
Consumer Safety Officer	10/25/84	Plant Engineer	10/25/84

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

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OMB No. 2070-0007
Approval expires 8-31-85

1. INVESTIGATION IDENTIFICATION		
DATE: 10/25/84	INSPECTOR NO.: 143	DAILY SEQ. NO.: N/A

2. FIRM NAME: Sherwin - Williams Co.

3. INSPECTOR NAME: Robert E. Peterson

4. FIRM ADDRESS: 1450 Sherwin Street
Emeryville, CA 94608

5. INSPECTOR ADDRESS: EPA Region 9, 215 Fremont St.
San Francisco, CA 94105

6. CHIEF EXECUTIVE OFFICER NAME:

7. TITLE:

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It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:	If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.
I have received and read the notice	
SIGNATURE: X [signature]	NAME:
NAME: Charles Bartsch	TITLE:
TITLE: Plant Engineer / DATE SIGNED: 10/25/84	ADDRESS:

EPA Form 7740-4 (12-82)

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

EPA

TOXIC SUBSTANCES CONTROL ACT

RECEIPT FOR SAMPLES AND DOCUMENTS

Form Approved
OMB No. 2070-0007
Approval expires 8-31-86

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE: 10/25/84	INSPECTOR NO.: 143	DAILY SEQ. NO.: —	Sherwin Williams Co.
3. INSPECTOR ADDRESS: EPA Region 9 215 Fremont St. San Francisco, CA 94105			4. FIRM ADDRESS: 1450 Sherwin St. Emeryville, CA 94608

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Toxic Substances Control Act.

RECEIPT OF THE DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
01102584RP	Sample of heat transfer fluid (Therminol) taken from line adjacent to heat transfer fluid pump, 2nd floor
Doc. 02102584RP	Memo from J.E. Port, Central Engr. Facilities, dated 1-10-72 re: Therminol 66
Doc. 03102584RP	Memo to J.E. Port from R.R. Brohn, Oakland, dated 5-17-72 re: completion of Therminol replacement
Doc. 04102584RP	~~Memo from Brohn to Port~~ Handwritten notes dated 4/82 re: Therminol replacement that occurred 4/26/82, written by Tom Williams, Chemist
Doc. 05102584RP	Material Safety Data Sheet for Therminol 66, from Monsanto

OPTIONAL:

DUPLICATE OR SPLIT SAMPLES: REQUESTED AND PROVIDED ☑ NOT REQUESTED ☐

INSPECTOR SIGNATURE	RECIPIENT SIGNATURE
Robert E. Peterson	Charles H Barton
NAME: Bob Peterson	NAME: ~~Peter~~ CHARLES H BARTON
TITLE: Consumer Safety Officer	TITLE: Plant Engineer
DATE SIGNED: 10/26/84	DATE SIGNED: 10/25/84

EPA Form 7740-1 (12-82)

INSPECTOR'S FILE

SHERWIN WILLIAMS CHEMICAL COATINGS

Kendall E. Trautwein
Laboratory Director

The Sherwin-Williams Co.
1450 Sherwin Avenue
Emeryville, CA 94608
(415) 652-2700

SHERWIN WILLIAMS COATINGS

The Sherwin-Williams Company
1450 Sherwin Avenue
Emeryville, California 94608
(415) 652-2700

C. H. Bartsch
Plant Engineer

SHERWIN WILLIAMS CHEMICAL COATINGS

Robert J. Storey
Manager of Planning & Materials

The Sherwin-Williams Co.
1450 Sherwin Avenue
Emeryville, CA 94608
(415) 652-2700

DOC. # 0210 2584 KP
AL 10/25/84

C. H. BARTSCH

Chicago

Central Facilities
Engineering

Various

January 10, 1972

xx As Directed

Heat Transfer Fluid for
Varnish Reactors
CFE Inst. #135

12/21/71- JEP

Monsanto has advised us that they are no longer manufacturing Therminol FR fluids.

It is therefore imperative to proceed immediately on the basis of the above referenced letter to install the smothering CO_2 system prior to replacement of Therminol FR with Therminol 66 in your system.

J. E. Port
J. E. Port
Project Engineer
Central Facilities Engr.

JEP/lc

cc: DTR RPT RBB CHB FCG RAT LJK RDP HST FAK RGL

[illegible] 10/25/84

Oakland

Plant Manager

Chicago

May 17, 1972

J. E. Fort

Heat Transfer Fluid for
Varnish Reactors
CPE Inst. #135

5-12-72

The replacement of Therminol FR heat transfer fluid with Therminol 66 was completed in the Oakland factory early in the year.

We actually made two separate shipments back to the manufacturer and all of the material is out of the plant.

R. R. Bruhn

RRB/ps

cc: RPT RAT CHB FCG

Thermino Change - 4/82 VA-0110001N dk 10/25/84

4/26/82 Drained all Therminol out of system
1 Drum from heat exchanger
6 Drums from outlet on 2nd floor
1½ Drum (18 5's from under Evaporator)
2 Drums sludge & clean from expansion tank on roof
9½ Drums total

(< 1 gal from 3rd floor expan tank)

6 new drums pumped in - boiler would not start

4/28 2 more drums added to system. Low liquid level light on expansion tank went out and boiler started

Ordered 1 spare drum.

Doc # 0510258 4 RP 10/25/84 RGP

Monsanto MATERIAL SAFETY DATA

K.E.T.

MONSANTO PRODUCT NAME

THERMINOL® 66 HEAT TRANSFER FLUID

MONSANTO COMPANY
800 N. LINDBERGH BLVD.
ST. LOUIS, MO 63167

Emergency Phone No.
(Call Collect)
314-694-1000

PRODUCT IDENTIFICATION

THERMINOL® heat transfer fluid is a proprietary product. It is not identified by a CAS number. All components appear on the Inventory of Chemical Substances published by the U.S. Environmental Protection Agency.

Chemical Family: Hydrogenated Terphenyls

DOT Hazard Class: This product is not classified as a hazardous material by the U.S. Department of Transportation

Label Requirement: Product Label

Reportable Quantity (RQ) under U.S. Clean Water Act Regulations: Not Listed

U.S. Surface Freight Classification: Heat Transfer Agents or Media, N.O.I.B.N.

PRECAUTIONARY MEASURES AND FIRST AID

HANDLE IN ACCORDANCE WITH GOOD INDUSTRIAL HYGIENE AND SAFETY PRACTICES. THESE PRACTICES INCLUDE AVOIDING UNNECESSARY EXPOSURE AND REMOVAL OF THE MATERIAL FROM EYES, SKIN AND CLOTHING.

Precautions against ignitions and fire should be taken with this product.

OCCUPATIONAL CONTROL PROCEDURES

Eye Protection: THERMINOL 66 heat transfer fluid releases irritating vapors when heated. Wear chemical safety goggles to prevent contact with irritating vapor.

Skin Protection: Wear protective gloves to minimize skin contact.

Respiratory Protection: Use NIOSH approved equipment when airborne exposure is excessive. Consult respirator manufacturer to determine appropriate type equipment for given application.

Ventilation: Provide ventilation to minimize exposure. Local exhaust ventilation preferred. Additional ventilation may be necessary when handling this material above ambient temperature or pressure.

Airborne Exposure Limits: Terphenyls (CAS No. 26140-60-3):

OSHA PEL: 1 ppm (9 mg/m³) Ceiling
ACGIH TLV®: 0.5 ppm (5 mg/m³) Ceiling

Hydrogenated Terphenyls (CAS No. 61788-32-7)
ACGIH TLV®/TWA: 0.5 ppm (5 mg/m³)

FIRE PROTECTION INFORMATION

Flash Point:	345°F	***Method:***	Cleveland Open Cup
Flash Point:	315°F	***Method:***	Pensky-Martens
Fire Point:	385°F	***Method:***	Cleveland Open Cup
Auto Ignition Temperature:	705°F	***Method:***	ASTM D-2155

Flammability Limits 0.9-8.8% @ 200°C (estimated)

Extinguishing Media: Water spray, foam, dry chemical, CO_2 or other agents suitable for Class B fires.

Special Firefighters Procedures: On burning, this product can release toxic fumes and vapors. Firefighters should wear self-contained breathing apparatus and full protective clothing.

THERMINOL 66 heat transfer fluid is not classified as a fire-resistant heat transfer fluid. Precaution should be taken to avoid exposure to ignition sources in case of spills or leaks of hot fluid. The use of protective devices may be required to minimize fire risk. Consult carrier of fire insurance.

PHYSIOLOGICAL EFFECTS SUMMARY

Industrial experience has demonstrated that this product, when heated, may be irritating to the eyes of some individuals.

Oral LD_{50} (Rats): 10,000 mg/kg, Practically Nontoxic
Dermal LD_{50} (Rabbit): >2,000 mg/kg, Slightly Toxic
Eye Irritation (Rabbit): (FHSA) 0.3 on a scale of 110.0, Practically Nonirritating
Skin Irritation (Rabbit): (FHSA) 0.1 on a scale of 8.0, Practically Nonirritating
Aerosol Inhalation (Rats): 0 out of 10 rats died when exposed to 11.1 mg/l air during a 4 hour exposure period.

The following information represents the results of tests conducted to assess the physiological properties of this material. Dosages were intentionally selected to induce toxic effects. This information was used by qualified experts to develop the labeling statements and the recommended Occupational Control Procedures. Evaluation of the significance of the data from individual studies may require professional knowledge of toxicology. The available information from these studies indicate that this material can be handled safely if the recommended practices are followed.

Patch testing of 254 human volunteers with the product compounded in a plasticized film or tested as a pure material produced no positive reactions following initial application, during serial applications or upon challenge application 10-14 days later. The product is not considered a primary irritant, a fatiguing agent or sensitizing agent.

No mutagenic response was observed when the product was tested using four *Salmonella* strains, both in the presence and absence of mammalian microsomal activation.

Daily application of the product to the skin of rabbits during a 21-day dermal toxicity study produced gross and microscopic changes in the skin at all dosage levels tested: 125, 500 and 2000 mg kg/day. No other evidence of systemic toxicity was observed.

The product was evaluated in a chronic aerosol inhalation study exposing monkeys, rats and hamsters to concentrations of 0, 10 and 50 mg/m³ for 6 hours/day, 5 days/week for 6 months. A slight body weight reduction was noted in both low and high dose monkeys. No other treatment related effects were observed. No evidence of histopathological changes were seen in animals exposed to 50 mg/m³.

Physiological Effects Summary Continued On Next Page

PHYSIOLOGICAL EFFECTS SUMMARY (Continued)

No adverse effects were observed in a 4-week subacute aerosol inhalation study in rats exposed to THERMINOL 66 at 20, 50, 250 mg/m³ for 6 hours/day, 5 days/week.

No adverse effects were observed in a 90-day feeding study with rats fed diets containing 100, 300 and 1000 ppm of this product.

In a reproductive toxicity study in white leghorn chickens fed THERMINOL 66 at levels of 30, 100, and 300 ppm egg production was reduced at the 300 ppm level. There were no adverse effects in the parental generation, hatchability of eggs, or in the offspring.

PHYSICAL DATA

Appearance:	Clear oily liquid	***Vapor Pressure @ 25°C:***	<0.1 mm Hg
Odor:	Faint, characteristic	***@ 150°C:***	2.6 mm Hg
		@ 200°C:	22 mm Hg
Solubility in Water @ 25°C:	Practically insoluble	***@ 250°C:***	95 mm Hg
Specific Gravity @ 25/25°C:	1.003 - 1.009	***Boiling Point @ 1 atm:***	340°C
Pour Point:	-26°C		

Note: These physical data are typical values based on material tested but may vary from sample to sample. Typical values should not be construed as a guaranteed analysis of any specific lot or as specification items.

REACTIVITY DATA

Stability: Product is stable under ordinary conditions of storage and handling.

Hazardous Decomposition Products: This product will generate carbon monoxide (CO), Carbon dioxide (CO_2), hydrocarbons, smoke, and soot when burned.

Hazardous Polymerization: Will not occur.

SPILL, LEAK & DISPOSAL INFORMATION

Waste Disposal: Waste product should be incinerated or disposed of in an approved hazardous waste landfill in accordance with local, state and federal regulations.

Spill or Leakage Procedures: Spills should be confined and absorbed on a suitable medium such as sawdust, clay, or filtercel and disposed of as recommended above.

This material should not be dumped, spilled, rinsed, or washed into sewers or public waterways.

ADDITIONAL COMMENTS

Environmental Toxicity Information:

96-hr LC_{50} Trout: >1,000 mg/l, Practically Nontoxic
96-hr LC_{50} Minnows: >1,000 mg/l, Practically Nontoxic
96-hr LC_{50} Algae, Cell Count: 56 mg/l, Slightly Toxic
Chlorophyll α: 44 mg/l, Slightly Toxic
48-hr LC_{50} *Daphnia* (Water Flea): 0.10 mg/l, Highly Toxic

The product was evaluated in a 24 hour semi-continuous microbial activated sludge test. Primary degradation was approximately 42-56%. Biodegradability was classified as intermediate.

Heat transfer fluids are intended only for indirect heating purposes. Under no circumstances should this product contact or in any way contaminate food, animal feed, food products, food packaging materials, pharmaceuticals or any items which may directly or indirectly be ultimately ingested by humans. Any contact may contaminate these items to the extent that their destruction may be required.

DATE: September, 1983 **REVISED:** **SUPERSEDES:**
MSDS NO.: M00006964

FOR ADDITIONAL NON-EMERGENCY INFORMATION, CONTACT:

Monsanto Company
800 North Lindbergh Blvd.
St. Louis, MO 63167
314-694-1000

This form has been approved by the Occupational Safety and Health Administration as "equivalent to" OSHA Form 20.

ENVIRONMENTAL PROTECTION AGENCY
Office of Enforcement

CHAIN OF CUSTODY RECORD

215 Fremont Street
San Francisco, California 94105

PROJ. NO.	PROJECT NAME
N/A	Sherwin Williams Co.

SAMPLERS: *(Signature)* Robert S. Peterson

STA. NO.	DATE	TIME	COMP.	GRAB	STATION LOCATION	NO. OF CONTAINERS	PCB Analysis	REMARKS
N/A	10/25/84	—		✓	Heat Exchange Fluid	1	✓	
					Sample No. 01102584RP			

Relinquished by: *(Signature)*	Date / Time	Received by: *(Signature)*	Relinquished by: *(Signature)*	Date / Time	Received by: *(Signature)*
Relinquished To: Fed Express Robert S. Peterson	10/26/84 PM 12:00				
Relinquished by: *(Signature)*	Date / Time	Received by: *(Signature)*	Relinquished by: *(Signature)*	Date / Time	Received by: *(Signature)*
Relinquished by: *(Signature)*	Date / Time	Received for Laboratory by: *(Signature)*	Date / Time	Remarks	

Distribution: Original Accompanies Shipment; Copy to Coordinator Field Files

9-1477

File: [illegible]

January 6, 1982

State of Arkansas
Dept. of Pollution Control & Ecology
8001 National Drive
Little Rock, Arkansas 72219

Gentlemen:

Attached you will find your copy of a "Hazardous Waste Manifest" for 25 gallons of Transformer oil containing PCB contamination.

This material is being transported by I.T. Corporation to ENSCO Corp., P. O. Box 1975, American Oil Road, El Dorado, Arkansas 71730, for high temperature incineration.

Very truly yours,

THE [illegible] CO.

Henry R. Ratcliff

Henry R. Ratcliff

HRR:jm

cc: REH FCG

STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL & ECOLOGY
8001 NATIONAL DRIVE LITTLE ROCK, ARKANSAS 72219
TELEPHONE (501) 371-1701

6

HAZARDOUS WASTE MANIFEST

AR- 08201

INSTRUCTIONS ON BACK — PLEASE TYPE OR FIRMLY PRINT IN ALL INFORMATION

GENERATOR/SHIPPER

STATE I.D. # _____ EPA I.D. # CAD009934601

COMPANY Sherwin Williams Co.

ADDRESS 1450 Sherwin Ave.

CITY Emeryville STATE CA ZIP 94608 PHONE (415) 652-2200

DESCRIPTION OF WASTES

U.S. D.O.T. SHIPPING NAME	EPA H.W. Code #	Total Quantity By Weight or Volume	CONTAINERS No.	CONTAINERS Type	Hazardous Properties* (T) (C) (I) (R)
Polychlorinated Biphenyl		55 gals.	1	17H	T

*(T) TOXIC, (C) CORROSIVE, (I) IGNITABLE, OR (R) REACTIVE

IMMEDIATE RESPONSE INFORMATION	PHONE	Placards affixed/Provided
Henry R. Ratcliffe or E. J.	(415) 652-2200 NATIONAL RESPONSE CENTER 1-800-424-8802	

SPECIAL HANDLING INSTRUCTIONS/GENERATOR/SHIPPER COMMENTS

Gloves and goggles

GENERATOR'S/SHIPPER'S CERTIFICATION: This is to certify that the above named materials are properly classified, described, packaged, marked and labeled; are in proper condition for transportation according to the applicable regulations of the Department of Transportation, the EPA, and the Arkansas Department of Pollution Control & Ecology, and have been consigned to the licensed hazardous waste transporter named herein on this date.

SIGNATURE _____ PRINT NAME _____ DATE _____

TRANSPORTER NO. 1 STATE I.D. # _____ EPA I.D. # _____

COMPANY _____

ADDRESS _____

CITY _____ STATE _____ ZIP _____ DATE _____ PERMIT NO. _____

TRANSPORTER CERTIFICATION: This is to certify that the transporter named above received the waste material in the quantity described hereon on the date shown in proper condition for shipment from the Generator/Shipper for shipment to the destination shown.

SIGNATURE _____ PRINT NAME _____ DATE _____

TRANSPORTER NO. 2 STATE I.D. # _____ EPA I.D. # _____

COMPANY _____

ADDRESS _____

CITY _____ STATE _____ ZIP _____ DATE _____ PERMIT NO. _____

TRANSPORTER CERTIFICATION: This is to certify that the transporter named above received the waste material in the quantity described hereon on the date shown in proper condition for shipment from the Generator/Shipper for shipment to the destination shown.

SIGNATURE _____ PRINT NAME _____ DATE _____

TREATMENT/STORAGE/DISPOSAL FACILITY STATE I.D. # _____ EPA I.D. # _____

COMPANY _____

ADDRESS _____

CITY _____ STATE _____ ZIP _____ PHONE _____

FACILITY CERTIFICATION: This is to certify that the waste material described below was delivered by the Transporter to this Facility on this date; that this Facility is permitted to accept the waste under the terms of its current permits, and is accepted (subject to the following discrepancies noted, if any).

SIGNATURE _____ PRINT NAME _____ DATE _____

ALTERNATE TREATMENT STORAGE DISPOSAL FACILITY STATE I.D. # _____ EPA I.D. # _____

COMPANY _____

ADDRESS _____

CITY _____ STATE _____ ZIP _____ PHONE _____

FACILITY CERTIFICATION: This is to certify that the waste material described below was delivered by the Transporter to this Facility on this date; that this Facility is permitted to accept the waste under the terms of its current permits, and is accepted (subject to the following discrepancies noted, if any).

SIGNATURE _____ PRINT NAME _____ DATE _____

GENERATOR WILL MAIL THIS COPY TO: ARKANSAS DEPARTMENT OF POLLUTION CONTROL & ECOLOGY WITHIN 2 WORKING DAYS OF SHIPMENT

BAY AREA AIR QUALITY MANAGEMENT DISTRICT

939 ELLIS STREET • SAN FRANCISCO, CALIFORNIA 94109 • (415) 771-6000

February 17, 1984

Sherwin-Williams Co
P O Box 23505
Oakland, Ca 94623

Attn: C R Hartsch
Plant Engineer

Gentlemen:

The Bay Area Air Quality Management District, under a grant from the US Environmental Protection Agency, is compiling an inventory of emissions of potentially toxic air contaminants.

The first step in this project is the identification of users/handlers/producers of these materials. Your cooperation with this effort is greatly appreciated.

Please look at the attached list of chemicals. Check the appropriate box if you use, handle or package, or produce any of the listed chemicals. Indicate any chemicals that appear as intermediates in your processes. Finally, please indicate any chemicals that may be present or produced in any incineration operations.

Please return the completed form by April 15, 1984, whether you use any of these chemicals or not. A negative answer is just as valuable to this survey as a positive one.

We are not requesting chemical usage rates at this time. We may contact you at some future date to obtain this information.

Again, thank you for your assistance. If you have any questions or comments, please call Steve Hill at (415) 771-6000, extension 261.

Very truly yours,

Daniel S. Goalwin

Daniel Goalwin
Director, Permit Services Division

F. M. Bruhns - Chicago

Oakland Plant Manager

Cleveland March 14, 1972

F. C. Gaugush

MAR 17 1972

Process Effluent Sewer
Oakland - CFE 0-59

In answer to your telephone call this morning, we inquired with the analyst of Frederiksen Engineering Co. as to the significance of item C-54 of the questionnaire completed for the East Bay Municipal Utility District.

He identifies PCB-242 as a polychlorinated benzene which they have been permitted to use as a reference standard for chlorinated hydrocarbons in their analysis. This in turn he describes as a polyphenol bichloride.

In reviewing the various materials used in the Oakland factory we have a combination of chlorinated phenols, etc., etc., any of which could end up in our effluent and be grouped in this C-54 category. Among the items we currently use are methylene chloride, sodium pentachloro phenate, 10 38 21, and Dowicide-6, 10 34 00.

The data presented in the report is 0.02 milligrams of total chlorinated hydrocarbons per liter of water effluent. If our mathematics are correct, this total of hydrocarbons would calculate out to be approximately 3.2 grams per day. In view of the general use of Dowicide-6 and sodium pentachloro phenate in latex paints this would appear to us to be a very realistic figure.

R. R. Bruhn

RRB/ps

cc: F. M. Bruhns

CENTRAL FACILITIES ENGINEERING
MAR 17 1972

Special Attention

G2

Factory:

Date	Batch or Tank Location	Code Filling Date	Lab. No.	Sample Location (Filing) No.	Quantity	Test	Sp. Gr. @75F	Color	Clarity	Visc.	A. V. Solids	N.V.M.	Cure Pt.	Dry		Reject or O. K.	Tester	REMARKS
						Min.												
						Std.												
	Location		Temp.	PH	solids	Appearance			Tester									
11-72	varnish		59°F	7.9	.013	cloudy			FRJ									
11-72	paint		70°	11.4	.16	white			FRJ									
16-72	varnish		68	4.5	.10	cloudy			FRJ									
16-72	paint		60	11.4	.10	cloudy			FRJ									

use separate cards hereafter

COATINGS MANUFACTURING
WASTE MANAGEMENT SURVEY
OCTOBER 1, 1980

PLANT DATA

LOCATION Sherwin Williams Oakland Factory 1450 Sherwin Ave. Emeryville Ca 94608

DATE SURVEY COMPLETED 10-29-80

PLANT MANAGER R.E. HEINE

SURVEY PREPARED BY G.R. RATCLIFFE

I. PRODUCTION	1979	1980
A. SOLVENT-BORNE PAINT	1,309,693 GAL	1,122,968 GAL
B. WATER-BORNE PAINT	2,122,187 GAL	2,561,582 GAL
C. RESIN & VARNISH		
1) INTERMEDIATE	424,437 GAL	661,641 GAL
2) DIRECT SALE	848,875 GAL	437,047 GAL
D. THINNERS	1,358,200 GAL	1,286,861 GAL
TOTAL	6,063,392 GAL	6,070,100 GAL
E. TOTAL NO. EMPLOYEES	240 AVG.	216 AVG.

II. SUMMARY OF PLANT WASTE DISPOSAL	1979	1980
A. OIL&WASTE PAINT	9,500 GAL (E) $ 3806	8,700 GAL (E) $ 4160
B. WATER-BORNE SLUDGE (IND EMULSION, CAUSTIC)	14,225 GAL (E) $ 5625	13,493 GAL (E) $ 6379
C. SOLVENT-BORNE SLUDGE	38,280 GAL (E) $ 34,859	84,012 GAL (E) $ 35,075
D. DRY WASTE*	421 TONS (A) $ 18,587	405 TONS (E) $ 25,265
E. SOLVENT RECLAIMED	54,702 GAL (E) $ 29,581	138,789 GAL (E) $ 182,842
F. SEWAGE	4,410 1000 GAL (E) $ 5,160**	4,358 1000 GAL (E) $ 7303**
TOTAL DISPOSAL COST	$ 97,618	$ 261,024

*LOOSE WASTE CALCULATED @75#/CU.YD.
COMPACT WASTE CALCULATED @370#/CU.YD.

** PLUS $500 PERMIT FEES

Oakland
CAD003934601

III. Plant Waste Disposal Locations & Facilities Used

A. POTW (Public Owned Treatment Works)

Name (City or Company) East Bay Municipal Utility District

Address P.O. Box 24055 Oakland Ca 94623

Principal Contact Joseph Damas Jr. / V.C. Danos

Billings 1979 $5160 1980 $1303

B. STM Municipal Storm Sewer

Name City of Emeryville

Address 2449 Powell St. Emeryville Ca 94608

Principal Contact —

Billings 1979 — 1980 —

C. Municipal Land Fill (Include privately owned)

Name Oakland Scavenger Company

Address See Trash Hauler

Principal Contact —

Billings 1979 — 1980 —

D. Hazardous Land Fill

CAT000646117

Name Chemical Waste Management Inc.

Address 430 West Elm Ave. P.O. Box 1104 Coalinga, Ca. 93210

Principal Contact Contacts & Payments Thru Romic Chemical only

Billings 1979 — 1980 —

E. Solvent Reclaimer

CAD009452651

Name Romic Chemical Corporation

Address 2081 Bay Road East Palo Alto, Ca 94303

Principal Contact H.M. Schneider — President

Billings 1979 $29,581 1980 $ 82,842

III. PLANT WASTE DISPOSAL LOCATIONS & FACILITIES USED (CONT'D)

F. TRASH HAULER

NAME Oakland Scavenger Company

ADDRESS 2601 Peralta Oakland Ca

PRINCIPAL CONTACT _____

BILLINGS 1979 $19,930 1980 $25,265

G. HAZARDOUS WASTE HAULER

NAME Comic Chemical Corporation

ADDRESS 2081 Bay Road East Palo Alto, Ca 94303

PRINCIPAL CONTACT H. M. Schneider - President

BILLINGS 1979 $44,290 1980 $50,676

H. SALVAGE PAINT OUTLET

NAME David Bunfilt

ADDRESS 2435 Fountain Oaks, Morgan Hill, Ca

PRINCIPAL CONTACT David Bunfilt

CREDITS 1979 $6000 1980 $6130

I. CORRUGATED & PAPER RECYCLER

NAME —

ADDRESS —

PRINCIPAL CONTACT —

CREDITS 1979 — 1980 —

J. PALLET RECLAIMER

NAME Dynamic Pallet Corporation

ADDRESS P.O. Box 677 Antioch Ca 94509

PRINCIPAL CONTACT John Richards

CREDITS 1979 _____ 1980 _____

II. RCRA Non-Hazardous Waste

A. General Rubbish

	1979	1980
1) Shipped Loose	2000 yds³(A) $ 6700	933 yds³(E) $ 4665
Sent to	☑ Mun Landfill ☐ Hazard Landfill ☐ Other	☑ Mun Landfill ☐ Hazard Landfill ☐ Other
2) Shipped Compacted	1890 yds(A) $ 13,230	2000 yds(E) $ 20,600
Sent to	☑ Mun Landfill ☐ Hazard Landfill ☐ Other	☑ Mun Landfill ☐ Hazard Landfill ☐ Other

B. Packing Materials (Corrugated and Fiber Board Slip Sheets)

1) Shipped Loose	_____ tons/yds³( ) $_____	_____ tons/yds³( ) $_____
Sent to	☐ Recycle ☐ Mun Landfill ☐ Other SEE General Rubbish	☐ Recycle ☐ Mun Landfill ☐ Other
2) Shipped Compacted	_____ tons/yds( ) $_____	_____ tons/yds( ) $_____
Sent to	☐ Recycle ☐ Mun Landfill ☐ other	☐ recycle ☐ Mun Landfill ☐ Other

C. Emptied Containers

1) Pigment bags — To General Rubbish

A) Shipped Loose	_____ tons/yds( ) $_____	_____ tons/yds( ) $_____
Sent to	☐ Recycle ☐ Mun Landfill ☐ Other	☐ Recycle ☐ Mun Landfill ☐ Other
B) Shipped Compacted	_____ tns/yds³( ) $_____	_____ tons/yds³( ) $_____
Sent to	☐ Recycle ☐ Mun Landfill ☐ Other	☐ Recycle ☐ Mun Landfill ☐ Other

2) DRUMS, PAILS, CANS

DRUMS 1979

A) SHIPPED LOOSE 24,100 EACH [redacted]^3(E) $ 253,050

SENT TO ☑ RECYCLE ☐ MUN LANDFILL ☐ OTHER

B) SHIPPED COMPACTED ______ TONS/YDS^3( ) $ ______

SENT TO ☐ RECYCLE ☐ MUN LANDFILL ☐ OTHER

C) SCRAP RECOVERED ______ TONS( ) $ ______

EXPLAIN Drums to Myers Drum Co. For Reclaim

DRUMS 1980

24,642 EACH [redacted]^3(E) $ 300,331

☑ RECYCLE ☐ MUN LANDFILL ☐ OTHER

1128 PAILS EACH [redacted]^3(E) $ 1176

☐ RECYCLE ☐ MUN LANDFILL ☐ OTHER

______ TONS( ) $ ______

EXPLAIN Drums To Myers Drum Co. Pails To Gonzalez Bucket Co. For Reclaim.

SHERWIN WILLIAMS

COATINGS

The Sherwin-Williams Company
1450 Sherwin Avenue
Emeryville, California 94608
Phone (415) 652-2700

Mail Address
P. O. Box 23505
Oakland, California 94623

February 23, 1984

Mr. Steve Hill
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Attn: Permit Services

Enclosed is the copy of the report on "Potentially Toxic Chemicals" as requested.

THE SHERWIN-WILLIAMS CO.

C. H. Bartsch
Plant Engineer

CHB:jm

enc.

cc: REH FCG

1450 Sherwin Avenue
Emeryville, Ca 94608
Plant # 101

Potentially Toxic Chemicals (as identified by the U.S. EPA)
(*) chemical under study by ARB

	We purchase this chemical	We package this chemical	We manufacture this chemical	This chemical may be an intermediate	This chemical may be present in our incinerator
Acetaldehyde	[ ]	[ ]	[ ]	[ ]	[ ]
Acrolein	[ ]	[ ]	[ ]	[ ]	[ ]
Acrylonitrile	[ ]	[ ]	[ ]	[ ]	[ ]
Allyl Chloride	[ ]	[ ]	[ ]	[ ]	[ ]
Arsenic (*)	[ ]	[ ]	[ ]	[ ]	[ ]
Asbestos	[ ]	[ ]	[ ]	[ ]	[ ]
Benzene (*)	[ ]	[ ]	[ ]	[ ]	[ ]
Benzyl Chloride	[ ]	[ ]	[ ]	[ ]	[ ]
Beryllium	[ ]	[ ]	[ ]	[ ]	[ ]
Cadmium	[ ]	[ ]	[ ]	[ ]	[ ]
Carbon Tetrachloride	[ ]	[ ]	[ ]	[ ]	[ ]
Chlorobenzene	[ ]	[ ]	[ ]	[ ]	[ ]
Chlorofluorocarbon (FC-113)	[ ]	[ ]	[ ]	[ ]	[ ]
Chloroform	[ ]	[ ]	[ ]	[ ]	[ ]
Chloroprene	[ ]	[ ]	[ ]	[ ]	[ ]
Chromium	[ ]	[ ]	[ ]	[ ]	[ ]
Coke	[ ]	[ ]	[ ]	[ ]	[ ]
o-,m-,p-Cresol	[✓]	[ ]	[ ]	[✓]	[ ]
Dichloromethane	[✓]	[ ]	[ ]	[✓]	[ ]
p-Dichlorobenzene	[ ]	[ ]	[ ]	[ ]	[ ]
Dialkyl Nitrosamines (*)	[ ]	[ ]	[ ]	[ ]	[ ]
Dimethyl Nitrosamine	[ ]	[ ]	[ ]	[ ]	[ ]
1,4-Dioxane	[ ]	[ ]	[ ]	[ ]	[ ]
Dioxin	[ ]	[ ]	[ ]	[ ]	[ ]
Epichlorohydrin	[✓]	[ ]	[ ]	[✓]	[ ]
Ethylene Dibromide (*)	[ ]	[ ]	[ ]	[ ]	[ ]
Ethylene Dichloride	[ ]	[ ]	[ ]	[ ]	[ ]
Ethylene Oxide	[ ]	[ ]	[ ]	[ ]	[ ]
Formaldehyde	[✓]	[ ]	[ ]	[✓]	[ ]
Hexachlorocyclopentadiene	[ ]	[ ]	[ ]	[ ]	[ ]

Potentially Toxic Chemicals (as identified by the U.S. EPA)
(*) chemical under study by ARB

	We purchase this chemical	We package this chemical	We manufacture this chemical	This chemical may be an intermediate	This chemical may be present in our incinerator
Lead	[X]	[ ]	[ ]	[X]	[ ]
Maleic Anhydride	[X]	[ ]	[ ]	[X]	[ ]
Manganese	[ ]	[ ]	[ ]	[ ]	[ ]
Mercury	[ ]	[ ]	[ ]	[ ]	[ ]
Methyl Bromide (*)	[ ]	[ ]	[ ]	[ ]	[ ]
Methyl Chloroform (see 1,1,1 Trichloroethane)					
Methylene Chloride (see Dichloromethane)					
Nickel	[ ]	[ ]	[ ]	[ ]	[ ]
Nitrobenzene	[ ]	[ ]	[ ]	[ ]	[ ]
Nitrosomorpholine	[ ]	[ ]	[ ]	[ ]	[ ]
Percholoroethylene (see Tetrachloroethylene)					
Phenol	[ ]	[ ]	[ ]	[ ]	[ ]
Phosgene	[ ]	[ ]	[ ]	[ ]	[ ]
Polychlorinated Biphenyls	[X]	[ ]	[ ]	[ ]	[ ]
Propylene Oxide	[X]	[ ]	[ ]	[X]	[ ]
Radionuclides (*)	[ ]	[ ]	[ ]	[ ]	[ ]
Toluene	[X]	[X]	[ ]	[X]	[ ]
1,1,1 Trichlorethane	[ ]	[ ]	[ ]	[ ]	[ ]
Tetrachloroethylene	[ ]	[ ]	[ ]	[ ]	[ ]
Trichloroethylene	[ ]	[ ]	[ ]	[ ]	[ ]
Vinyl Chloride	[X]	[ ]	[ ]	[X]	[ ]
Vinylidene Chloride	[ ]	[ ]	[ ]	[ ]	[ ]
o,m,p- Xylene	[X]	[X]	[ ]	[X]	[ ]

Please check if none of the above apply [ ]

Mail to: Bay Area Air Quality Management District
939 Ellis Street
San Francisco, California 94109
Attn: Permit Services

G.S.K.

SEP 27 1984

5522

cc: GSKuntz - 11 Midland

September 24, 1984

Daniel Goalwin, Director
Permits Services Division
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Plant #101 - Hazardous Air Pollutants Survey

Dear Mr. Goalwin:

Please find attached the completed special substance survey - Part II as requested. As discussed with Steve Hill, gathering this information was not a simple task because of the complexity of the use of these chemicals. This report represents our best estimate of the amounts of material used.

The survey lists several substances that need some clarification as to their use.

1) Lead: This material is purchased only as compounds of the element and not as the metal. As advised by Steve Hill, it is not required to report these materials.

2) Epichlorohydrin, Vinyl Chloride: Polymers made from these materials are purchased at this plant but these substances are not.

Also, it was noted that Polychlorinated Biphenyls were listed by us on the Part II survey. We do not purchase or have this material at this facility. In view of the foregoing, we ask that the survey be corrected by deleting Epichlorohydrin, Vinyl Chloride and Polychlorinated Biphenyls. Removal of these substances would make the survey more accurate with respect to use and distribution of the substances of interest.

If there are any questions regarding the report, please contact us.

Sincerely,

THE SHERWIN-WILLIAMS COMPANY

D. L. Tanhane
Plant Manager

DPT:jr

Plant # 191
Sherwin-Williams Co
1450 Sherwin Avenue
Emeryville, Ca 94608

BAY AREA AIR QUALITY MANAGEMENT DISTRICT
Special Substance Survey--Part II

Please circle units used (L = lbs, G = gallons)
Please indicate annual figures for 1983; accuracy should be within 10%.
Quantities < 100 lb/yr may be reported as "< 100 lb/yr".

Substance	Quantity Purchased in 1983		Quantity Purchased as a Component of a Mixture: Qty mixture purchased		% substance in mixture		Quantity Incorporated Into Product: Qty mixture produced		% substance in mixture	
o-,m-,p-Cresol	None	L/G	2,380	(L)/G	18	%	750,000	L/G	3	%
Dichloroethane	None	L/G		L/G		%		L/G		%
Epichlorohydrin	None	L/G		L/G		%		L/G		%
Formaldehyde -	None	L/G		L/G		%		L/G		%
Lead - Purchased as compounds only		L/G		L/G		%		L/G		%
Maleic Anhydride	22,000	(L)/G	None	L/G		%	Chemical Reactant	(L)/G		%
Propylene Oxide	945	(L)/G	None	L/G		%	360,000	(L)/G	1-5	%
Toluene	2,140,000	(L)/G	2,360,000	(L)/G	1-90	%	63,600,000	(L)/G	< 1-50	%
Vinyl Chloride	None	L/G		L/G		%		L/G		%
o-,m-,p-Xylene	733,000	(L)/G	269,000	(L)/G	5-95	%	1,380,000	L/G	< 1-50	%

-9-

c. WASTEWATER DISCHARGE – continued

CONSTITUENT

INSTRUCTIONS

Fill in each box with the concentration present in the Composite Sample.

METALS

Test by semiquantitative spectrographic analysis where applicable.
(milligrams per liter)

C 5	Aluminum		C24	Chromium		C33	Potassium	
C 6	Antimony		C25	Copper		C34	Selenium	
C 7	Arsenic		C26	Iron		C35	Silver	
C 8	Barium		C27	Lead		C36	Sodium	
C 9	Beryllium		C28	Magnesium		C37	Titanium	
C10	Boron		C29	Manganese		C38	Tin	
C11	Cadmium		C30	Mercury		C39	Vanadium	
C12	Calcium		C31	Molybdenum		C40	Zinc	
C 3	Cobalt		C32	Nickel				

OTHER CONSTITUENTS

Analyze for those substances that are added as a result of your activity at the premises.
(milligrams per liter)

C 1	Bromide		C47	Sulfate		C53	Algicides *	
C 2	Chloride		C48	Sulfide		C54	Chlorinated * Hydrocarbons	
C 3	Chlorine		C49	Sulfite		C55	Pesticides *	
C 4	Cyanide		C50	Formaldehyde		C56	Solvents *	
C15	Fluoride		C51	Phenols		C57	Radioactivity *	
C16	Iodide		C52	Surfactants MBAS		C58	Other *	

* IDENTIFY _____

Do you consider this sample to be: ☐ Typical ☐ Weaker than normal ☐ Stronger than normal

SPECIAL REMARKS _____

I certify that the above information is accurate and factual to the best of my knowledge.

Signed By _____ Title _____ Date _____

INSTRUCTIONS FOR COMPLETING WASTEWATER DISCHARGE QUESTIONNAIRE

The information given on this questionnaire should all pertain directly to the premises served by the water service having the account number shown on the attached address label. The location of this premise is shown on the bottom line of a recent EBMUD water bill for this account number.

a. ORGANIZATION

A01

Enter the Standard Industrial Classification number which applies to the activity generating the wastewater discharge sampled for this questionnaire. The appropriate SIC number may be found in the 1967 Standard Industrial Classification manual (reference) on page 1 of the questionnaire. This information is available at the Public Library.

A02-12

Enter the address of the building at which the wastewater discharge is sampled. This should be the address served by the water service account number shown on the attached address label.

b. ACTIVITY

ITEM 1.

Use this section to describe the business activity on the premises. The description should be in sufficient detail to include such items used as detergents, corrosion inhibitors, pesticides etc. Attach an additional page if necessary.

EXAMPLE

At this location we manufacture paints, by a dispersion process in which pigments are incorporated into a liquid media consisting of binders and thinners. The pigments, binders and thinners are purchased from an outside supplier. The pigments used are in powder form and extend from clays, (magnesium silicates or iron oxides) to chemically produced metal oxides (titanium dioxide or iron oxide) to organic colorants and extenders (fillers, aluminum base). The binders (solution or emulsion) used are natural oils and gums (such as linseed, soya, dammar, gum, etc.) and synthetically produced resins (alkyd, phenolic, vinyl, acrylate, polyether and others). The thinners include acetate, aliphatic, and/or aromatic hydrocarbons as well as water. Approximately 20,000 gallons of latex and approximately 50,000 gallons of base exterior commercial trade paints are produced annually.

ITEM 2.

Enter the number of persons employed at the premises A02 on the date the sample is collected.

ITEM 3.

Enter the hours of the day that the premises are used (e.g. 8 a.m. to 5 p.m.). Do not include the time when there may be only a janitor or security guard on duty.

ITEM 4.

Estimate average quantities in gallons per day. The total supply from EBMUD should be checked using recent water bills to verify the accuracy of these estimates.

ITEM 5

Check the box(es) which best describe(s) the waste treatment process at the premises. The description should include the capacity, horsepower, or other information pertinent to the treatment process.

c. WASTEWATER DISCHARGE

B01

Estimate the Peak Hourly Discharge Rate from the premises. Hourly water supply meter readings may be used provided the filling and discharge of storage tanks, processes, etc. are taken into consideration.

The Maximum Daily Discharge Rate is the greatest flow which might be discharged in any one day.

A season is defined as a period of one month or longer.

B02-B22

The Composite Sample is to be collected on a normal working day over the period recorded in ITEM b3. Sufficient samples is to be collected every hour to give a minimum of eight (8) gallons at the end of the sampling day. For premises that have a normal 8-hour working day, eight (8) one-gallon samples will suffice.

Sampling Point - Take the sample on the premises if possible. If there is no suitable sampling location on the premises, samples may in some cases be taken at a sewer manhole in the street. . . care should be taken that the sample contains only waste water from the premises being sampled. Where several separate discharges exist from the one site, the largest waste stream should be sampled as close as possible to the city sewer.

The sample must be tested without delay by a laboratory approved by the State Department of Public Health. Keep the sample under refrigeration until the tests are run and retain one quart for thirty (30) days following submission of the questionnaire for inspection by the District.

Composite Sample Test Results - Have the sample analyzed in accordance with Standard Methods for Examination of Water and Wastewater, 13th Edition, 1971, A.P.H.A., specifically considering the instructions below. Record the values obtained from the laboratory under COMPOSITE SAMPLE TEST RESULTS.

Estimates - Enter under the columns headed Peak Hourly and Maximum Daily your own best estimates for the various values of the characteristic or constituent listed. If your business has seasonal variations, enter them in the Average Daily column.

Under Average Annual, enter your best estimate for the average value discharged over the last year.

B03.

The temperature should be taken at the time of sampling and averaged.

B04.

The end point for the titration is to be pH 3.7.

B06.

Use the dichromate flux method with sufficient $HgSO_4$ to complex the chloride ion.

B07.

The drying temperature should be 103°C.

B16.

Measure residual chlorine (not less than 0.1 mg/l) after a contact time of one (1) hour.

B17.

Use the Soxhlet extraction method.

SPECIAL REMARKS

This section may be used to designate portions of this questionnaire which might disclose trade secrets or secret processes and which you request to be withheld from public inspection. Any other remarks may also be included here.

SIGNATURE

The questionnaire must be signed by a plant manager, managing officer, partner or owner. The name and title of the person signing should be indicated.

c WASTEWATER DISCHARGE

	WASTEWATER FLOW RATE	PEAK HOURLY Gals/Minute	MAXIMUM DAILY Gals/Day	AVERAGE DAILY Gals/Day		AVERAGE ANNUAL Gals/Day
				Seasonal Max	Seasonal Min	
B01						

IF SEASONAL VARIATION EXISTS, Record the Months.

Season of Maximum Flow Rate: FROM _____ TO _____

Season of Minimum Flow Rate: FROM _____ TO _____

	CHARACTERISTIC CONSTITUENT		COMPOSITE SAMPLE TEST RESULTS	ESTIMATES				
				PEAK HOURLY	MAXIMUM DAILY	AVERAGE DAILY		AVERAGE ANNUAL
						Seasonal Max	Seasonal Min.	
B02	pH	Unit						
B03	Temperature	°F						
B04	Alkalinity ($CaCO_3$)	mg/l						
B05	Biochemical Oxygen Demand (BOD)	mg/l						
B06	Chemical Oxygen Demand (COD)	mg/l						
B07	Total Solids	mg/l						
B08	Settleable Solids	ml/l/hr						
B09	Total Dissolved Solids	mg/l						
B10	Total Suspended Solids	mg/l						
B11	Volatile Dissolved Solids	mg/l						
B12	Ammonia	mg/l						
B13	Kjeldahl Nitrogen	mg/l						
B14	Nitrate & Nitrite as N	mg/l						
B15	Total Volatile Acids (Distillation Method)	mg/l						
B16	Chlorine Demand	mg/l						
B17	Oil & Grease	mg/l						
B18	Total Phosphorus as P	mg/l						
B19	Color	APHA Units						
B20	Hardness (EDTA)	mg/l						
B21	Fish Bioassay Toxicity (TL_{50} @ 96 hrs using Stickleback Fish)							
B22	Percent Survival of Fish in undiluted wastewater							

Reference: Standard Methods for the Examination of Water & Wastewater, 13th Edition, 1971, A.P.H.A.

Date Sample Collected, January _____, 1972 ····· Estimate Discharge to the Sewer for that day is _____ gals.

B23 Record the Area exposed to rainwater reception which is connected to the sanitary sewer. (Include both roof and ground level area.) _____ Sq. Ft.

SPECIAL DISTRICTIONS / EAST BAY MUNICIPAL UTILITY DISTRICT

Wastewater Discharge Questionnaire

a. ORGANIZATION

A01 S.I.C. Code Number* (SEE PAGE 4 FOR INSTRUCTIONS) ☐☐☐☐

A02 1. NAME OF ORGANIZATION DISCHARGING WASTEWATER

2. ADDRESS OF WASTEWATER DISCHARGE POINT (If different from mailing address)

ZIP

3. TELEPHONE | 4. NAME OF INDIVIDUAL RESPONSIBLE FOR WASTEWATER DISPOSAL

TITLE

b. ACTIVITY

[If a commercial or professional organization, state nature of business; if an industry, state nature of business, raw materials, products, waste materials & a general process description.]

1. DESCRIPTION

2. NUMBER OF EMPLOYEES AT DISCHARGE LOCATION

3. HOURS OF DAY DURING WHICH DISCHARGE OCCURS: TO

4. USE & DISPOSITION OF WATER QUANTITY (Record in gallons per day)

Purpose	Supply From		Discharge To	
	E.B.M.U.D.	Other*(1)	Sanitary Sewer	Other*(2)
Cooling Water				
Boiler Feed				
Process				
Waste Down				
Employee/Sanitary				
Other*(3)				
Total ► ►				

*Other: (Check)

(1) ☐ Well ☐ Creek ☐ Estuary ☐ Bay ☐ Storm Sewer ☐ Reclaimed Water

(2) ☐ Well ☐ Creek ☐ Estuary ☐ Bay ☐ Storm Sewer ☐ Rail, Truck or Barge

(3) Describe

5. TREATMENT GIVEN TO WASTE PRIOR TO DISCHARGE TO SANITARY SEWER SYSTEM (Check & describe present treatment practices)

☐ None ☐ Holding Tank ☐ Chemical Treatment ☐ Grease Trap ☐ Sedimentation

☐ Grinding ☐ Screening ☐ pH Adjustment ☐ Oil & Water Separator ☐ Biological Treatment

☐ Other ____ DESCRIPTION

TEL PHONE 65 -27(-0
AREA CODE 4'5

PURCHASE ORDER

No. Y 7 2

THE SHERWIN-WILLIAMS CO.

P. O. BOX 23505
OAKLAND, CALIFORNIA 94623

January 14, 1972

Frederiksen Engineering Co. Inc.
Executive Center Building
755 Broadway
Oakland, Ca. 94612

INVOICES — ON DAY OF SHIPMENT MAIL INVOICE IN TRIPLICATE WITH BILLS OF LADING WEIGHT CERTIFICATE AND PACKING LIST TO THE SHERWIN-WILLIAMS CO. PURCHASING DEPARTMENT, P. O. BOX 23505, OAKLAND, CALIFORNIA 94623. INVOICES MUST SHOW CODE, REQUISITION, AND PURCHASE ORDER NUMBERS, CAR NUMBER AND ROUTING. A COPY OF THE PACKING LIST MUST ALSO ACCOMPANY EACH INDIVIDUAL SHIPMENT

2-23

E.X.P. APP. 1615

SHIPMENT MUST BE MADE AS SPECIFIED NOTIFY US PROMPTLY IF ANY DELAY IS EXPECTED

SHIP TO
THE SHERWIN-WILLIAMS CO.
1450 SHERWIN AVENUE
OAKLAND, CALIFORNIA

Analyses Of Composite Sample (Not Included Are Algicides or Pesticides) And Report Of Results. This Does Not Include Sample Gathering.

The Analysis Should Be In Accordance With The East Bay Municipal Utility District Waste Water Discharge Questionnaire.

The Analysis Will Be Taken On The Waste Water Discharge Sample Which Sherwin-Williams Will Provide Wednesday, Jan. 19 at 10:00 a.m.

The analysis And Report Must Be Delivered In Writing, To The Office Of The Plant Manager Of The Sherwin-Williams Co. No Later Than Friday, February 4, 1972.

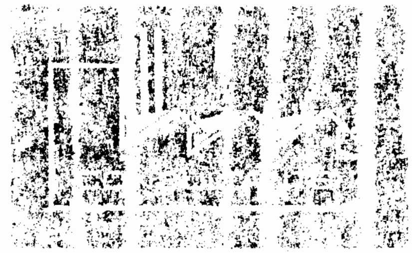
Sherwin-Williams SIC No. 34-0 2-6 50. Total Cost $650.00

Not Confirming

R.C. Laust

28E1 M 2-71 37178

FREDERIKSEN
ENGINEERING CO. INC.
[illegible] CENTER BUILDING
[illegible] BROADWAY — OAKLAND CA 94612
TELEPHONE AREA [illegible], 452-[illegible] OR 465 0644



January 13, 1972 File: 012

QUOTATION - WASTER DISCHARGE SURVEY

Mr. George Learned
Sherwin-Williams
1450 Sherwin Avenue
Emeryville, California, 94608

Dear George:

As per our discussions, we are pleased to quote as tabulated below for the EBMUD waste water discharge survey:

1. Analyses of Composite Sample (not included are algicides or pesticides) and report of results. This does not include sample gathering.................................$ 650.00

2. Consulting and assisting in setting up a monitoring program........................ $ 21.00/hr.

3. Further authorized analyses as performed by Frederiksen's Laboratory............... See attached fee schedule

Very truly yours,

FREDERIKSEN ENGINEERING CO., INC.

C. Kwasnicki
Chief Chemist

CK/kr
Enclosure

TOXIC MATERIALS

Aug 4 inventory

Code #	TRADE NAME	TOXIC COMPONENT	LOCATION	HOW USED	QUANTITY USED	QUANTITY STORED	ULTIMATE LOCATION
52000 #1	Phosphine Acid 85%	Phosphoric Acid		(Acid Catalyst Urea)	5 Gal	10 Gal	
800791	Chrome Lemon Base	Lead Chromate		Base Storage	—	—	
800857	Chrome Lt Base	Lead Chromate	(overstock)	" "	—	35 #	
801078	Chrome Yellow Base	Lead Chromate		" "	20 #	400 #	
801090	Chrome Yellow Base	Lead Chromate	(overstock)	" "	—	2236 #	
801450	Yellow for Grain Base	Lead Chromate		" "	90 #	490 #	
802050	Chrome Yellow Base	Lead Chromate		" "	10 #	455 #	
807257	Cadmium yellow Base	Cadmium	(overstock)	" "	—	110 #	
832550	Moly Orange Base	Lead Molybdate		" "	75 #	330 #	
833250	Moly Orange Base	Lead Molybdate		" "	—	—	
833-40	Moly Orange Base	Lead Molybdate		"	10 #	48 #	
833-55	Moly Orange Base	Lead Molybdate		" "	40 #	290 #	
838-94	Moly Orange Base	Lead Molybdate		" "	10 #	60 #	

TOXIC MATERIALS

Aug 4 Inventory

Code #	TRADE NAME	TOXIC COMPONENT	LOCATION	HOW USED	QUANTITY USED (Average 30 days)	QUANTITY STORED	ULTIMATE LOCATION
802021	Chrome Yel. SK 28C	Lead Chromate	R+S		3000#	5800#	
802340	Chrome Yel. X3356	Lead Chromate	"		1250	3550	
802821	Med Chrome Yellow	Lead Chromate	"		300	330	
803425	X3218 Chrome Yellow	Lead Chromate	"		25	320	
803623	X 2891 Yellow for Green	Lead Oxide Lead Chromate	"		300	100	
806421	M50 Basic Lead Silico Chromate	Lead Oxide	"		1000	2050	
806422	Oncor Y67	Lead Oxide	"		500	450	
807200	Cadmium Lithopone	Cadmium	"		—	—	?
814521	Cadmium Red Toner	Cadmium	"		20	40	?
~~830131~~	~~Ortho Dichloro Benzene~~	~~Chlorine~~				~~500~~	40
040110	Methanol	Methyl Alcohol			900 Gal	900 Gal	
~~086710~~	~~Phenyl Mercuric Oleate~~	~~Mercury~~			—	~~100~~	
~~086812~~	~~" " Acetate~~	~~Mercury~~			—	~~20~~	
090350	Lead Naphthenate 24%	Lead	"		5,200#	10,087#	
103551	Tetrachlorophenol	Chlorine	"		50 Gal	150 Gal	
493171	Arochlor 1260	Chlorinated Biphenyl	circuits "		—	50#	

TOXIC MATERIALS

Aug 4 Inventory

	TRADE NAME	TOXIC COMPONENT	LOCATION	HOW USED	QUANTITY USED (Average 30 Days)	QUANTITY STORED	ULTIMATE LOCATION
128700	Chlorowax 70	Chlorinated Paraffin	R+S Dept		200#	350#	
020411	Dowicide A		"		1500	2100	
103400	Dowicide 6		"		None Disc	4800	
103821	Sodium Pentachlorophenate		"		700	800	
178671	Dowicide 100		"		600	1000	
581021	Litharge	Lead Oxide	"		4000	2150	
541121	Busan 11	Barium Metaborate	"		1900	1300	
493500	Aroclor 5460	Chlorinated Rubber	"		2000	320	
593021	Cuprous Oxide	Copper Oxide	"		150	200	
680100	45X Lead Silicate	Lead Oxide	"		6000	1600	
680622	Dry White Lead	Lead Carbonate	"		1500	950	
682200 12088	Leaded Zinc	Lead Sulfate	"		5000	16950	
685100	Antimony Oxide	Antimony Oxide	"		400	120	
800025	CP Yellow Primrose	Lead Chromate	"		700	15	
800[illegible]	X2717 Primrose Yellow	Lead Chromate	"		750	450	
900126	Krolor Yellow	Lead Chromate	"		20	50	
800400	X 3595 [illegible]	Lead Chromate	"		2000	850	